

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Billed Party Preference
of 0+ InterLATA Calls

)
)
)
)

CC Docket No. 92-77

RECEIVED

JUN 17 1992

Federal Communications Commission
Office of the Secretary

REPLY COMMENTS

GTE Service Corporation and its affiliated domestic telephone operating companies ("GTE") hereby submit the following reply to the comments filed regarding proprietary calling cards and 0+ access presented for expedited consideration in the above referenced Notice of Proposed Rulemaking ("NPRM" of "Notice"), FCC 92-169, released May 8, 1992.

In this Notice, the Commission is considering an alternate routing methodology known as Billed Party Preference ("BPP") for 0+ interLATA payphone traffic along with other types of operator-assisted interLATA traffic. In this initial expedited pleading cycle, interested parties have filed comments on whether the Commission should require Interexchange Carriers ("IXCs") to share their billing and validation data for any calling cards usable with 0+ access, before the implementation of BPP, or restrict the use of proprietary cards to access code calling.

GTE previously stated that it does not support either of the interim solutions proposed. Industry resources would be more wisely spent concentrating on the long-term BPP proposal. GTE responds further as the issues relate to the Local Exchange Carriers ("LECs").

No. of Copies rec'd _____
List A B C D E

0+4

DISCUSSION

The cost and the timing of the interim solution to BPP makes it prohibitive.

GTE discussed the various outcomes which could result if the Commission requires AT&T to release billing and validation information for its proprietary card. According to AT&T, at 5, "there is no circumstance in which AT&T could envision making its calling card data available for validation and billing by its [Operator Service Provider] competitors." Thus, the only other option if the Notice were implemented would be for the AT&T proprietary card to be offered through the use of access code dialing. GTE opposes restricting the AT&T proprietary calling card to access code dialing since it would require costly and time consuming enhancements to the network. As explained in GTE's Comments, the network would have to be expanded so that GTE could block 0+ calls and send 10XXX 0+ to AT&T on separate trunk groups.

Some parties who support the proposal that AT&T open its billing and validation data to all IXC's do not discuss this technical aspect. Rather they focus on a plan which they perceive is "simpler and consumer friendly." See, e.g., Zero Plus Dialing, Inc. ("ZPDI") at 13. Even if this would increase options for the consumer, the Commission must consider the technical modifications which would be needed to implement the interim plan within a short time frame.

US West, at 7, expresses it precisely when it states that this proposal is "an inefficient and unnecessary expenditure of resources without commensurate end user benefits." In addition, Southwestern Bell, at 5, finds that "[t]he implementation period for this concept would equal or exceed the period required for development of BPP." Southwestern Bell also discusses the need for "specially designed Signaling System Seven ("SS7") -- between LEC end-

offices and IXC operator services switches -- for processing operator service calls." AT&T also raises an SS7 issue, at 8, stating that "[s]tandardization of the SS7 protocol to provide such information is currently under consideration, but even if those standards are eventually adopted it would take several years for LECs to deploy that capability and IXCs to modify their operator systems to function with it." GTE agrees that the proposal raises additional technological requirements. Thus, when considered from a technical vantage, the interim solution proposed in the NPRM is not a viable alternative to BPP.

LECs should be permitted to continue their arrangement with AT&T for the validation of the proprietary card for intraLATA calls.

With regard to IXC proprietary cards, a few parties suggest that if AT&T, and any other IXC, wishes to issue a proprietary card that the card should be restricted so that the LEC could not accept the card. In other words, these parties believe that "LECs should also be precluded from access to validation and billing for proprietary cards issues by an IXC." ZPDI at 7 Advanced Telecommunications Corporation ("ATC"), at 3, also believes that GTE Airfone should also be excluded from what they see as a "discriminatory arrangement."

The arrangement the GTOCs have with AT&T differs from what is currently being proposed by the Commission. The existing contracts between the GTOCs and AT&T permit the GTOCs to accept and validate the AT&T proprietary card as a means of payment for LEC services for the benefit of the GTOCs' customers. The GTOCs do not have access to AT&T's customer billing information. The bills are rendered by AT&T, but the charges are at the GTOCs' rates. Similarly, GTE Airfone's customers can use any of several proprietary cards to bill for the Airfone call. This differs significantly from the Commission's

proposal which would require AT&T to release the billing information and allow another carrier to bill the customer at that carrier's rates.

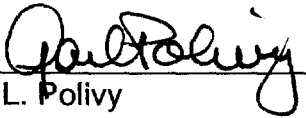
Thus, even if the Commission were to decide that proprietary cards are to be limited as proposed in the Notice, there is no reason not to permit the LECs to continue to accept an IXC's proprietary card for billing of the LEC's call.

CONCLUSION

For the foregoing reasons, the Commission should decline to adopt either of the interim solutions proposed in the NPRM. Instead, the Commission and the industry should concentrate their resources on implementing BPP as soon as possible.

Respectfully submitted,

GTE Service Corporation and its
affiliated GTE domestic telephone
operating companies

By 
Gail L. Polivy
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

June 15, 1992

THEIR ATTORNEY

Certificate of Service

I, Jennifer R. McCain, hereby certify that copies of the foregoing "Reply Comments Of GTE" have been mailed by first class United States mail, postage prepaid, on the 17th day of June, 1992 to the parties on the attached list:


Jennifer R. McCain

Service List
92-77 (RM-6726)
June 17, 1992

Douglas F. Brent
Associate Counsel
10000 Shelbyville Road
Louisville, KY 40233
Counsel for Advanced
Telecommunications
Corporation, Americall
Systems, Inc., and First
Phone of New England,
Inc.

Roy L. Morris
Deputy General Counsel
Allnet Communications Services
1990 M Street N.W.
Suite 500
Washington, D.C. 20036

Albert H. Kramer
Robert F. Aldrich
Keck, Mahin & Cate
1201 New York Avenue, NW
Penthouse Suite
Washington, DC 20005-3919
Counsel for American
Public Communications
Counsel

Francine J. Berry
American Telephone
and Telegraph
295 North Maple Ave.
Room 3244J1
Basking Ridge, NJ 07920

Floyd S. Keene
Ameritech Operating Companies
30 S. Wacker Drive
39th Floor
Chicago, IL 60606

John R. Young
1710 H Street N.W.
Washington, D.C. 20006
Counsel for Bell Atlantic

Leonard M. Sbaratta
BellSouth Corporation
1155 Peachtree Street, NE
Suite 1800
Atlanta, GA 30367-6000

Randolph J. May
Sutherland, Asbill & Brennan
1275 Pennsylvania Ave, NW
Washington, DC 20004-2404
Counsel for Capital
Network System, Inc.

Andrew D. Lipman
Swidler & Berlin, Chtd.
3000 K Street, NW
Suite 300
Washington, DC 20007
Counsel for Cleartel
Communications, Inc.,
U.S. Long Distance,
Coastal Automated
Communications Corp.,
Eastern Telecom Corp.,
Operator Assistance
Network, Zero Plus
Dialing, and LDDS
Communications

John A. Ligon
P.O. Box 880
Upper Montclair, NJ 07043
Counsel for ComTel
Computer Corporation,
Inc. and ITT
Communications, Inc.

Richard E. Wiley
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006
Counsel for Competitive
Telecommunications
Association and Operator
Service Providers of
America

David E. Smith
Director, Division of Appeals
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0861

G. Bruce Kuehne
Hiatt & Kuehne
Suite 400
100 E. Vermillion St.
Lafayette, LA 70501

Robert F. Aldrich
Keck, Mahin & Cate
1201 New York Avenue N.W.
Washington, D.C. 20005-3919
Counsel for Intellicall,
Inc.

Randall B. Lowe
Jones, Day, Reavis & Pogue
1450 G Street N.W.
Washington, D.C. 20005
Counsel for International
Telecharge, Inc.

International Transcription
Service
1919 M Street, NW
Room 246
Washington, DC 20054

James U. Troup
Arter & Hadden
1801 K Street, NW
Suite 400K
Washington, DC 20006
Counsel for Iowa Network
Services, Inc.

John M. Glynn, Esq.
People's Counsel
Maryland People's Counsel
231 East Baltimore Road
Baltimore, MD 21202

Mary J. Sisak
Donald J. Elardo
MCI Telecommunications
Corporation
1801 Pennsylvania Ave., NW
Washington, DC 20006

Randall B. Lowe
Sherry F. Bellamy
Suzanne M. Tetreault
Jones, Day, Reavis & Pogue
1450 G Street N.W.
Washington, D.C. 20005
Counsel for Metromedia
Long Distance, Inc.

Paul Rodgers
National Association of
Regulatory Utility
Commissioners
1102 ICC Building
Post Office Box 684
Washington, D.C. 20044

W. Dewey Clower
President
National Association of Truck
Stop Operators
1199 North Fairfax Street
Suite 801
Alexandria, VA 22314

David Cosson
National Telephone Cooperative
Association
2626 Pennsylvania Avenue N.W.
Washington, D.C. 20037

Judith St. Ledger-Roty
Reed, Smith, Shaw & McClay
including Pierson, Ball & Dowd
1200 18th Street N.W.
Washington, D.C. 20036
Counsel for National
Telephone Services, Inc.

James P. Tuthill
140 New Montgomery Street
Room 1522A
San Francisco, CA 94105
Counsel for Nevada Bell
and Pacific Bell

Douglas N. Owens
4705 16th Street, NE
Seattle, Washington 98105
Counsel for Northwest Pay
Phone Association

William B. Barfield
NYNEX Telephone Companies
120 Bloomingdale Rd.
White Plains, NY 10605

Stanley J. Moore
The Pacific Telesis Group
1275 Pennsylvania Ave., NW
4th Floor
Washington, DC 20004

Mitchell F. Brecher
Dow, Lohnes & Albertson
1255 Twenty-third Street N.W.
Washington, D.C. 20554
Counsel for Phonetel
Technologies, Inc.

Rick L. Anthony
Executive Vice President
Quest Communications
Corporation
6600 College Boulevard, Ste
205
Overland Park, KS 66211

Josephine S. Trubek, Esq.
Corporate Counsel
Rochester Tel. Center
180 South Clinton Avenue
Rochester, NY 14646-0700

Joseph P. Markoski
Squire, Sanders & Dempsey
1201 Pennsylvania Ave N.W.
P.O. Box 407
Washington, D.C. 20044

Larry Moreland
President
SDN Users Association, Inc.
600 W. Washington St., AD341
East Peoria, Illinois 61630

John B. Rooney
District Staff Manager
Federal Regulatory Matters
Southern New England Telephone
227 Church Street
New Haven, CT 06506

Randall D. Veselka
President
Southwest Pay Telephone
Systems, Inc.
P.O. Box 72906
Corpus Christi, TX 78472-2906

William C. Sullivan
Southwestern Bell Telephone
1010 Pine Street, Room 2114
St. Louis, MO 63101

David Wagenhauser
P.O. Box 12038
Washington, D.C. 20005
Counsel for
Telecommunications
Research and Action
Center

Robert M. Peak
Reboul, MacMurray, Hewitt,
Maynard & Kristol
1111 19th Street N.W.
Suite 406
Washington, D.C. 20036
Counsel for United
Artists Payphone
Corporation

W. Audie Long, Esq.
Kenneth F. Melley, Jr.
U.S. Long Distance, Inc.
9311 San Pedro, Suite 300
San Antonio, TX 78216

Leon M. Kestenbaum
1850 M Street NW
Suite 1100
Washington, DC 20036
Counsel for US Sprint
Communications Company

Martin T. McCue
General Counsel
United States Telephone
Association
900 19th Street, NW, Suite 800
Washington, DC 20006-2105

Dana A. Rasmussen
US West
1020 19th Street, NW
Suite 700
Washington, DC 20036

Constance Robinson
Luin Fitch
US Department of Justice
555 4th Street NW
Room 8106
Washington, DC 20001

H. Richard Juhnke
United Telecommunications,
Inc.
1850 M Street, NW
11th Floor
Washington, DC 20036

Glenn B. Manishin
Blumenfeld & Cohen
1615 M Street, NW, Suite 700
Washington, DC 20036
Counsel for Value-Added
Communications, Inc.

Samuel A. Simon, Esq.
World Institute on Disability
901 15th Street, NW
Suite 230
Washington, DC 20005